

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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MEGAN VILLELLA, Individually and on	:	Civil Action No. 1:15-cv-02106-ER-GWG
Behalf of All Others Similarly Situated,	:	(Consolidated)
	:	
Plaintiff,	:	<u>CLASS ACTION</u>
	:	
vs.	:	LEAD COUNSEL’S NOTICE OF MOTION
	:	AND MOTION FOR AN AWARD OF
CHEMICAL AND MINING COMPANY OF	:	ATTORNEYS’ FEES AND EXPENSES AND
CHILE INC., et al.,	:	AN AWARD TO LEAD PLAINTIFF
	:	PURSUANT TO 15 U.S.C. §78u-4(a)(4)
Defendants.	:	
	:	
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TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that Lead Counsel will move this Court on April 2, 2021, at 10:00 a.m., before the Honorable Edgardo Ramos, for entry of an order, pursuant to Rules 23 and 54 of the Federal Rules of Civil Procedure: (1) awarding attorneys’ fees; (2) paying litigation expenses incurred in prosecuting the Litigation; and (3) awarding Lead Plaintiff compensation for its time and service representing the Class in this action. This motion is based on: (i) the Memorandum of Law in Support of Lead Counsel’s Motion for an Award of Attorneys’ Fees and Expenses and an Award to Lead Plaintiff Pursuant to 15 U.S.C. §78u-4(a)(4); (ii) the Declaration of Aelish M. Baig in Support of: (1) Final Approval of Class Action Settlement; (2) Approval of Plan of Allocation; and (3) an Award of Attorneys’ Fees and Expenses and an Award to Lead Plaintiff Pursuant to 15 U.S.C. §78u-4(a)(4); (iii) the Declaration of Ross D. Murray; (iv) the Declaration of Lead Plaintiff; (v) the Declaration of Aelish M. Baig Filed on Behalf of Robbins Geller Rudman & Dowd LLP in Support of Application for Award of Attorneys’ Fees and Expenses; (vi) the Declaration of Michael I. Fistel,

Jr. Filed on Behalf of Johnson Fistel, LLP in Support of Application for Award of Attorneys' Fees and Expenses; (vii) the Stipulation of Settlement; and (viii) all other proceedings herein.

A proposed order will be submitted with Lead Plaintiff's reply submission on or before March 26, 2021.

DATED: February 26, 2021

Respectfully submitted,

ROBBINS GELLER RUDMAN
& DOWD LLP
DANIEL S. DROSMAN
ELLEN GUSIKOFF STEWART

s/ Ellen Gusikoff Stewart
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Lead Counsel for Plaintiff

CERTIFICATE OF SERVICE

I, Ellen Gusikoff Stewart, hereby certify that on February 26, 2021, I authorized a true and correct copy of the foregoing document to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such public filing to all counsel registered to received such notice.

/s/ Ellen Gusikoff Stewart

ELLEN GUSIKOFF STEWART